

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

IN RE ETHICON, INC. PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY  
LITIGATION

CIVIL ACTION NO. 2:12-md-02327  
MDL No. 2327

Hon. Judge Joseph R. Goodwin

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**This document applies to:**

Colleen Bowling v. Ethicon, Inc., et al.  
2:14-cv-26063

Tammy Rowan, et al. v. Ethicon, Inc., et al.  
2:14-cv-02822

Lisa Shaw, et al. v. Ethicon, Inc., et al.  
2:14-cv-25802

Candida Soto v. Ethicon, Inc., et al.  
2:14-cv-20814

Corrinne Suppa v. Ethicon, Inc., et al.  
2:14-cv-15978

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR ORDER  
REGARDING DISPOSITION OF NON-REVISION GYNECARE TVT  
PRODUCTS CASES**

NOW COME the above-referenced Plaintiffs, by and through the undersigned counsel, and in response to the motion of the Defendants, Ethicon, Inc. and Johnson & Johnson ("Ethicon") regarding the disposition of non-revision Gynecare TVT Products Cases (ECF Doc. 5313) set forth the following:

On March 2, 2018, Ethicon filed *Defendants' Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases* (ECF Doc. 5313), which proposes a disposition of cases in which the plaintiff has not undergone a revision

procedure. Accompanying the motion as Exhibit A is a list of cases that Ethicon maintains are cases in which the plaintiff has a Gynecare TVT product implanted and has had no revision procedure performed.

The above-named plaintiffs are included in Ethicon's list of plaintiffs who have not undergone a revision procedure. Each of the above-named plaintiffs have in fact undergone a revision procedure and are not properly included in Ethicon's motion. Plaintiffs' counsel has informed Ethicon that the above-named plaintiffs are not properly included in Defendants' motion pertaining to non-revision cases. Plaintiffs file this response to preserve their claims and avoid dismissal to the extent that Ethicon's motion is granted.

Respectfully submitted,

By: /s/ Zachary Lowe

**ZACHARY PETER LOWE**

Zachary P. Lowe, Esq. (WV ID# 13792)  
Nathan Buttars, Esq. (UT ID# 13659)  
LOWE LAW GROUP  
6028 S. Ridgeline Drive, Suite 200  
Ogden, UT 84405  
Tel. (801) 917-8500  
Fax: (801) 917-8484  
Email: [pete@lowelawgroup.com](mailto:pete@lowelawgroup.com)  
[nate@lowelawgroup.com](mailto:nate@lowelawgroup.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on March 15, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL

By: /s/ Zachary Lowe  
**ZACHARY PETER LOWE**

Zachary P. Lowe, Esq. (WV ID# 13792)  
Nathan Buttars, Esq. (UT ID# 13659)  
LOWE LAW GROUP  
6028 S. Ridgeline Drive, Suite 200  
Ogden, UT 84405  
Tel. (801) 917-8500  
Fax: (801) 917-8484  
Email: [pete@lowelawgroup.com](mailto:pete@lowelawgroup.com)  
[nate@lowelawgroup.com](mailto:nate@lowelawgroup.com)